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12 *Counsel for Defendant Verge Agency, Inc.*

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**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

1 N.Z., R.M., B.L., S.M., and A.L.,  
2 individually and on behalf of  
3 themselves and all others similarly  
4 situated,

5 Plaintiffs,

6 vs.

7 FENIX INTERNATIONAL LIMITED,  
8 FENIX INTERNET LLC, BOSS  
9 BADDIES LLC, MOXY  
10 MANAGEMENT, UNRULY  
11 AGENCY LLC (also d/b/a DYSRPT  
12 AGENCY), BEHAVE AGENCY LLC,  
13 A.S.H. AGENCY, CONTENT X, INC.,  
14 VERGE AGENCY, INC., AND ELITE  
15 CREATORS LLC,

16 Defendants.

CASE NO. 8:24-cv-01655-FWS-SSC

**DEFENDANT VERGE AGENCY,  
INC.'S DECLARATION OF BRENT  
SEGE IN SUPPORT OF MOTION  
FOR LEAVE TO APPEAR  
TELEPHONICALLY**

Date: February 6, 2025

Time: 9:00 a.m.

Crtrm.: 10D

Assigned to Hon. Fred W. Slaughter

I, Brent Sedge, declare as follows:

1. I am an attorney duly licensed to practice before all of the courts of the State of Texas and have been admitted *pro hac vice* in this Court. I am an associate with the firm Constangy, Brooks, Smith & Prophete LLP, and have appeared in this case as one of a counsel of record for Defendant Verge Agency, Inc. ("Verge").

2. I submit this Declaration in support of Defendant Verge Agency, Inc.'s Motion For Leave To Appear Telephonically.

3. The current in-person hearing date for the Court's Rule 26(f) Scheduling Conference in this matter for February 6, 2025, at 9:00 a.m. Likewise, the in-person hearing date on the Fenix Defendants' Motion to Dismiss for Forum Non Conveniens (ECF No. 60) and Motion to Compel Plaintiffs to Proceed in Their Real Names (ECF No. 61) is February 6, 2025 at 10:00 am.

4. Younjin Lee, lead counsel for Verge, has a scheduling conflict due to preexisting travel arrangements and will be unable to attend the Court's in-person hearing or remotely as these hearings are currently set.

5. I am based in Dallas, Texas, and have preexisting travel commitments set for early February 7, 2026, and thus am unable to travel to participate in these hearings as currently scheduled.

6. For these reasons, I respectfully request that the Court grant leave for me to appear remotely for both hearings set for February 6, 2025.

7. I have conferred with counsel for Plaintiffs who are unopposed to the relief requested by this Motion. In addition, I gave notice to all other Defendants and received no objection.

8. I declare under penalty of perjury that the forgoing is true and correct.

Executed this the 31st day of January 2025, in Dallas County, Texas.

**CONSTANGY, BROOKS, SMITH & PROPHETE, LLP**

By: /s/ Brent Sedge  
Brent Sedge

**CERTIFICATE OF SERVICE**

I am over 18 years of age and not a party to this action. I am employed in the County of Orange County, State of California. My business address is 3420 Bristol Street, 6th Floor, Costa Mesa, CA 92626.

On January 31, 2025, I caused to be served a true copy of the document(s) entitled:

**DEFENDANT VERGE AGENCY, INC.'S DECLARATION OF BRENT  
SEdge IN SUPPORT OF MOTION FOR LEAVE TO APPEAR  
TELEPHONICALLY**

on all individuals as indicated on the Court's ECF System

✓ **BY ELECTRONIC TRANSMISSION:** By causing the document(s) to be transmitted by the Court's PACER filing system to the e-mail addresses of the individuals as indicated above. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on January 31, 2025, in Costa Mesa, California.

/s/ Younjin Lee  
Younjin (Jennifer) Lee